

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

CASE NO: 21-cr-46

UNITED STATES
VS.

AFRASIABI,
Defendant

**DEFENDANT'S MOTION TO COMPEL THE GOVERNMENT TO RESPOND FULLY TO THE
DEFENDANT'S BILL OF PARTICULARS**

Now comes the Defendant, Afrasiabi, pro se, and moves the Court to compel the government to provide answers to all the questions and issues raised in the Bill of Particulars. Whereas the government in the past both in writings to the Defendant as well as the court hearings in July and August had promised to respond to the Bill of Particulars, unfortunately only partial responses have been provided and the government has failed to respond to specific requests for (a) any and evidence of contractual relationship between Afrasiabi and the Mission of Iran to UN, and (b) any and all evidence of pro-Iran propaganda writings by Afrasiabi.

Concerning both the above-stated issues, the government had avoided them and failed to respond to these requests stated in the Bill of Particulars. In light of the government's complaint that accuses Afrasiabi of writing "articles and books disguising propaganda," it is vitally important that the government provides a full and detailed response to the Bill of Particulars citing the evidence of propaganda writing on Afrasiabi's part. Afrasiabi has denied that he ever engaged in any propaganda writing and has repeatedly presented to court the evidence of his scholarly works and the compilation of his opinion articles in a book titled Agent of Peace rebutting the false and unsubstantiated allegations against him. Instead of providing any evidence pertaining to his extensive published record, the government has singularly focused on Afrasiabi's emails, some of which Afrasiabi has not authored and are untrue.

Respectfully,

Kaveh L. Afrasiabi, Pro Se

cc: A true copy of this letter has been submitted to the US Attorney on this date, OCTOBER 5 2021